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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Master File No. 3:07-md-05944-SC (N.D. Cal.)

MDL No. 1917

This Document Relates to: Individual Case
No. 13-cv-2171 (SC)

DELL INC. AND DELL PRODUCTS L.P.

PLAINTIFFS,

v.

HITACHI, LTD., *et al.*,

DEFENDANTS.

**DECLARATION OF DEBRA D.
BERNSTEIN IN SUPPORT OF DIRECT
ACTION PLAINTIFFS' RESPONSE IN
OPPOSITION TO SDI DEFENDANTS'
MOTION TO EXCLUDE TESTIMONY OF
PROFESSOR STEPHAN HAGGARD [MDL
DKT # 3172]**

1 I, DEBRA D. BERNSTEIN, declare as follows:

2 1. I am a Partner with the law firm of Alston & Bird LLP, counsel for Plaintiffs Dell Inc.
3 and Dell Products L.P. (collectively, "Dell") in the above-captioned action currently pending in the
4 U.S. District Court for the Northern District of California. I submit this Declaration in support of
5 Direct Action Plaintiffs' Response in Opposition to SDI Defendants' Motion to Exclude Expert
6 Testimony of Professor Stephan Haggard (the "Haggard *Daubert* Response").

7 2. I am a member in good standing of the State Bar of Georgia and am admitted to practice
8 before the U.S. District Court for the Northern District of Georgia. Pursuant to the Court's Pretrial
9 Order No. 1 in the MDL Proceeding, I have been admitted *pro hac vice* in this litigation.

10 3. Attached hereto as **Exhibit 1** is a true and correct copy of the April 15, 2014 Expert
11 Report of Stephan Haggard.

12 4. Attached hereto as **Exhibit 2** is a true and correct copy of the "Full Network of
13 Samsung Intra-Group Shareholdings (1998, 2002, 2007)" originally attached as supporting material to
14 the April 15, 2014 Expert Report of Stephan Haggard.

15 5. Attached hereto as **Exhibit 3** is a true and correct copy of the "Samsung SDI Personnel
16 Profiles Summary (1998-2007)" originally attached as supporting material to the April 15, 2014 Expert
17 Report of Stephan Haggard.

18 6. Attached hereto as **Exhibit 4** is a true and correct copy of the Samsung SDI Defendants
19 Responses to Dell Plaintiffs' Second Set of Requests for Admission.

20 7. Attached hereto as **Exhibit 5** is a true and correct copy of the Samsung Electronics'
21 Responses to Dell Plaintiffs' First Set of Requests for Admission.

22 8. Attached hereto as **Exhibit 6** is a copy of the July 10, 2014 deposition testimony of
23 Professor Stephan Haggard.

24 9. Attached hereto as **Exhibit 7** is a true and correct copy of Heitor Almeida, Sang Yong
25 Park, Marti Subrahmanyam, and Daniel Wolfenzon's article, "The structure and formation of business
26 groups: Evidence from Korean chaebols," dated July 20, 2010.

27 10. Attached hereto as **Exhibit 8** is a true and correct copy of Woochan Kim, Youngjae

1 Lim, and Taeyoon Sung's article "Group control motive as a determinant of ownership structure in
2 business conglomerates: Evidence from Korea's chaebols," dated February 22, 2007.

3 11. Attached hereto as **Exhibit 9** is a true and correct copy of Rafael La Porta, Florencio
4 Lopez-de-Silanes, and Andrei Shleifer's article "Corporate Ownership Around the World" published in
5 The Journal of Finance in April 1999 (at Vol. 54(2)).

6 12. Attached hereto as **Exhibit 10** is a copy of Young Hack Song and Christopher B.
7 Meek's article "The Impact of Culture on the Management Values and Beliefs of Korean Firms"
8 published in the Journal of Comparative International Management in 1998 (at Vol. 1(1)).

9 13. Attached hereto as **Exhibit 11** is a true and correct copy of a portion of Samsung
10 Electronics Co., Ltd. 1998 Annual Report, accompanied by a certified English translation.

11 14. Attached hereto as **Exhibit 12** is a true and correct copy of a portion of Samsung
12 Electronics Co., Ltd.'s 2002 Annual Report, accompanied by a certified English translation.

13 15. Attached hereto as **Exhibit 13** is a true and correct of Section VII of each of Samsung
14 Electronics Co., Ltd.'s Annual Reports from 1998 until 2007, accompanied by certified English
15 translations.

16 16. Attached hereto as **Exhibit 14** is a true and correct of Section VII of each of Samsung
17 SDI Co., Ltd.'s Annual Reports from 1998 until 2005, accompanied by certified English translations.

18 17. Attached hereto as **Exhibit 15** is a true and copy of T.L. Campbell & P.Y. Keys'
19 "Corporate governance in South Korea: the chaebol experience," an article published in the Journal of
20 Corporate Finance in 2002 (at Vol. 8(4)).

21 18. Attached hereto as **Exhibit 16** is a true and correct copy of Dong-Woon Kim's
22 "Interlocking Ownership in the Korean Chaebol," published in Corporate Governance: An
23 International Review in 2003 (at Vol. 11(132)).

24 19. Attached hereto as **Exhibit 17** is a true and correct copy of Sang M. Lee, Sangjin Yoo,
25 & Tosca M. Lee's "Korean Chaebols: Corporate Values and Strategies," an article published in the
26 Journal of Organizational Dynamics in 1991 (at Vol. 19(4)).

27 I declare under penalty of perjury under the laws of the United States of America that the
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1 foregoing is true and correct.

2 Executed on January 16, 2015 in Atlanta, Georgia.

3 */s/ Debra D. Bernstein*
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11 *Attorney for Plaintiffs Dell Inc. and Dell Products L.P*

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